

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

RITA CLEMENT	*	CIVIL ACTION
VERSUS	*	NO.
STANLEY ACCESS TECHNOLOGIES LLC, WAL-MART STORES, INC.	*	SECTION:
	*	MAGISTRATE
	*	JURY DEMAND

PETITION FOR REMOVAL

The Petition of Stanley Access Technologies LLC, improperly named as Stanley Access Technologies, LLC, a Limited Liability Company domiciled in and having its principal place of business in New Britain, Connecticut, and Wal-Mart Stores, Inc., a Corporation domiciled in and having its principal place of business in Bentonville, Arkansas, respectfully represent that:

I.

Defendant, Stanley Access Technologies LLC, was served with the Citation and original Petition for Damages on January 13, 2015. Wal-Mart Stores, Inc., was served with the Citation and original Petition for Damages on January 13, 2015, all as certified in the records of the Office of the

Clerk of Court for the 14th Judicial District Court for the Parish of Calcasieu, State of Louisiana, bearing Docket No. 2014-4890, Division "F."

II.

The above described action is a civil action of which this Court has original jurisdiction under the provisions of Title 28 U. S. C. § 1332. Complete diversity exists herein between plaintiff and defendants. Defendants assert herein that the matter in controversy exceeds \$75,000 exclusive of interest and costs.

III.

Plaintiff, Rita Clement, is a major domiciliary of the Parish of Calcasieu, State of Louisiana.

IV.

Defendant, Stanley Access Technologies LLC, is a Limited Liability Company formed in the State of Delaware and domiciled in and has its principal place of business in the State of Connecticut. Wal-Mart Stores, Inc., is a Corporation organized under the laws of the State of Delaware and is domiciled and has its principal place of business in the State of Arkansas. Accordingly, complete diversity of citizenship exists herein between plaintiff and defendants.

V.

Defendants, Stanley Access Technologies LLC, and Wal-Mart Stores, Inc. consent to the removal of these proceeding to the United States District Court for the Western District of Louisiana, Lake Charles Division.

VI.

Within ten (10) days from the date of filing of this Petition for Removal and accordance with the Local Rules of the United States District Court for the Western District of Louisiana, defendants

will file a Certificate pursuant to 28 U.S. C. § 1447(b), as well as copies of pleadings filed with the Clerk of Court for the 14th Judicial District Court for the Parish of Calcasieu, State of Louisiana.

VII.

Written Notice of the filing of this Petition for Removal and of the Removal of said lawsuit is being delivered to plaintiff, and a copy of this Petition for Removal is being filed with the Clerk of Court for the 14th Judicial District Court for the Parish of Calcasieu, State of Louisiana.

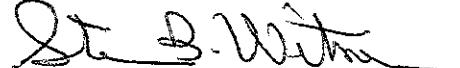
VIII.

The Petition for Removal is being signed pursuant to Rule 11 of the Federal Rules of Civil Procedure.

WHEREFORE, defendants Stanley Access Technologies LLC, improperly named as Stanley Access Technologies, LLC, and Wal-Mart Stores, Inc., pray that the above action in the 14th Judicial District Court for the Parish of Calcasieu, State of Louisiana, be removed therefrom to the United States District Court for the Western District of Louisiana, Lake Charles Division.

Respectfully submitted,

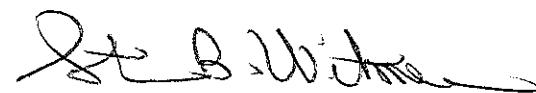
LAW OFFICES OF STEVEN B. WITMAN



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Attorney for Defendants, Stanley Access Technologies LLC, and Wal-Mart Stores, Inc.

CERTIFICATE OF SERVICE

I, hereby certify that on the 9th day of February, 2015, a copy of the foregoing Certificate Pursuant to 28 U. S. C. §1442(b), was filed electronically with the Clerk of Court using the CM/ECF system. Notice of this filing will be sent to Richard E. Wilson, Esq. by operation of the Court's electronic filing system and/or via E-mail and by depositing same, postage prepaid and properly addressed, in the United State Mail, this 9th day of February, 2015.



STEVEN B. WITMAN